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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media LLC, *et al.*,

Debtors.

Chapter 11

Case No. 16-11700 (SMB)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Thomas A. Martin, Esq. of the law firm Putney, Twombly, Hall & Hirson LLP hereby enters his appearance in the above-captioned case on behalf of St. Paul Fire & Marine Insurance Co. ("Travelers"), pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and Rule 2090-1(e) of the Local Bankruptcy Rules for the Southern District of New York (the "Local Rules").

PLEASE TAKE FURTHER NOTICE that the undersigned counsel, pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), Bankruptcy Rules 2002, 9007 and 9010(b) and Local Rule 2002-2(c), request that all notices given or required to be given in these case and all papers served or required to be served in this case be given to and

served upon the undersigned at the following office address, with a copy to the following email addresses:

Thomas A. Martin, Esq.
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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the rules and sections specified above but also includes, without limitation, any notice, application, complaint, demand, motion, order, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, electronic mail, hand or courier delivery, telephone, telecopy, email or otherwise filed with regard to these cases and proceedings therein. Further, this request includes copies of any disclosure statements to be submitted prior to approval and any and all plans of reorganization.

PLEASE TAKE FURTHER NOTICE that, this Notice of Appearance and Request for Service of Papers shall not be deemed to constitute consent to jurisdiction or venue of any type by Travelers, nor to be a waiver of (1) any rights of Travelers, including, without limitation, any rights (a) to have final orders in non-core matters entered in this case only after de novo review by a District Court, (b) to trial by jury in any proceeding so triable in this case or any case, controversy or proceeding related to this case or (2) to have a District Court withdraw the reference in any matter in this case subject to mandatory or discretionary withdrawal; or (3) any other rights, claims, actions, defenses, setoffs or recoupments to which Travelers is or may be

entitled, under law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Nor shall this Notice of Substitution of Counsel and Notice of Appearance and Request for Service of Papers be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under the applicable Bankruptcy Rules, Local Rules or the Federal Rules of Civil Procedure.

Dated: New York, New York
September 2, 2016

PUTNEY, TWOMBLY, HALL & HIRSON LLP

By: /s/ Thomas A. Martin
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